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District of Oregon
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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA,

6:19-cv-00707-BR

Plaintiff,

v.

**\$2,457,790.72 in Funds seized from
JPMorgan Chase Bank account
#xxx0905;
\$1,266,650.00 in Funds seized from
JPMorgan Chase Bank account
#xxx3511;
\$1,383.68 in Funds seized from
JPMorgan Chase Bank account
#xxx2125; \$200,653.71 in Funds seized
from
JPMorgan Chase Bank account
#xxx8881;
\$32,921.00 US Currency;
\$1,940.77 US Currency;
31.53810677 BTC;
1,022.39066800 ETH; and
5.74017141 BCH, *in rem*,**

Defendants.

**DECLARATION OF ASSISTANT
UNITED STATES ATTORNEY
AMY E. POTTER IN SUPPORT
OF MOTION TO LIFT STAY
AND FOR ENTRY OF A
DEFAULT JUDGMENT OF
FORFEITURE**

I, Amy E. Potter, am an Assistant United States Attorney for the District of Oregon assigned to the above-entitled forfeiture action. I have reviewed the records and files in this action, and from that review declare the following.

1. To the best of my knowledge and belief, Talon White, from whom the currency was seized, is not an infant or incapacitated person.

2. To the best of my knowledge and belief, Talon White, from whom the currency was seized, is not in the military service of the United States, within the meaning of the Soldier's and Sailor's Civil Relief Act, as amended.

3. On May 6, 2019, the United States filed a verified complaint *in rem* seeking forfeiture of the defendants, *in rem*, **\$2,457,790.72 in Funds seized from JPMorgan Chase Bank account #xxx0905; \$1,266,650.00 in Funds seized from JPMorgan Chase Bank account #xxx3511; \$1,383.68 in Funds seized from JPMorgan Chase Bank account #xxx2125; \$200,653.71 in Funds seized from JPMorgan Chase Bank account #xxx8881; \$32,921.00 US Currency; \$1,940.77 US Currency; 31.53810677 BTC; 1,022.39066800 ETH; and 5.74017141 BCH.**

4. On May 7, 2019, this Court issued a Warrant for Arrest of the defendant, and on May 8, 2019, the Department of Treasury executed the warrant.

5. On May 9, 2019, copies of the Complaint, Warrant, and Civil Case Assignment Order were mailed by certified mail, return receipt requested, to Tammy Pineda and were received on May 11, 2019. The delivery address on the certified mailer indicated 935 SW 7th Street, Newport, Oregon 97365.

6. On May 9, 2019, copies of the Complaint, Warrant, and Civil Case Assignment Order were mailed by certified mail, return receipt requested, to Chandra Moore and were received on

May 11, 2019. The delivery address on the certified mailer indicated 935 SW 7th Street, Newport, Oregon 97365.

7. On May 13, 2019, copies of the Complaint, Warrant, and Civil Case Assignment Order were mailed by email to Rain Minns, Attorney at Law, who agreed to accept service on behalf of claimant Talon White, from whom monies were seized. The email address used was rain@rainminnslaw.com.

8. All parties known to the United States as having a potential interest in these defendants were researched through Thomson Reuters Clear, a public records database to which the US Attorney' Office subscribes, to verify that mailing addresses are the most current.

9. I know of no other persons who may have an interest in defendants.

10. As previously indicated in the Declaration of Publication (ECF No. 13) filed on November 21, 2019, notice of this forfeiture proceeding was posted on an official government internet site www.forfeiture.gov for at least 30 consecutive days, beginning on May 8, 2019, and ending on June 6, 2019.

11. On June 14, 2019, Talon White filed a claim, and on July 8, 2019, Talon White filed an answer to plaintiff's complaint. (ECF Nos. 5 and 6).

12. No claims or answers have been filed. Under Rule G, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, the time for filing a claim and answer has passed.

13. On September 17, 2019, this Court granted the joint motion for a stay of this matter pending resolution of the underlying criminal action. (ECF No. 12).

14. On November 27, 2019, the government filed a signed withdrawal of claim and answer by Talon White. (ECF No. 14).

I declare under penalty of perjury that the foregoing is true and correct.

DATED: **December 19, 2019.**

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney

s/ Amy E. Potter
AMY E. POTTER
Assistant United States Attorney